

JOHN A. BERG, OSB# 120018
jberg@littler.com
PAUL E. CIRNER, OSB# 191471
pcirner@littler.com
LITTLER MENDELSON P.C.
1300 SW Fifth Avenue
Wells Fargo Tower, Suite 2050
Portland, OR 97201
Telephone: (503) 221-0309
Facsimile: (503) 242-2457

DANIEL PRINCE, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
FELICIA A. DAVIS, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071
Telephone: (213) 683-6000
Facsimile: (213) 627-0705

Attorneys for Defendant NIKE, INC.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

KELLY CAHILL SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-JR

**DECLARATION OF DANIEL PRINCE
IN SUPPORT OF NIKE INC.'S MOTION
FOR SANCTIONS AND CONTEMPT
RE: PLAINTIFFS' COUNSEL'S
UNAUTHORIZED DISCLOSURE OF
JUDICIAL RECORDS IN VIOLATION
OF COURT ORDERS**

ORAL ARGUMENT AND EXPEDITED
HEARING REQUESTED

DECLARATION OF DANIEL PRINCE

I, Daniel Prince, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the United States District Court for the Central District of California. I am admitted *pro hac vice* in the United States District Court for the District Court of Oregon. I am a partner with the law firm of Paul Hastings LLP, counsel of record for Defendant NIKE, Inc. (“NIKE”) in the above-captioned matter. I have personal knowledge of the facts herein, and if called upon to do so, could and would competently testify thereto.

2. I submit this Declaration in Support of NIKE’s Motion for Sanctions and Contempt regarding Plaintiffs’ Counsel’s Unauthorized Disclosure of Judicial Records in Violation of Court Orders.

3. Attached hereto as **Exhibit A** is a true and correct copy of an article by Elizabeth Hayes’ for the Portland Business Journal, entitled “*Holding Court: Meet the employment law attorney taking on Nike*,” dated February 23, 2023, and publicly available at <https://www.bizjournals.com/portland/news/2023/02/23/salerno-owens-markowitz-nike.html> (last visited March 30, 2024).

4. Attached hereto as **Exhibit B** is a true and correct copy of Laura Salerno Owens’ LinkedIn Post, publicly available at https://www.linkedin.com/posts/laura-salerno-owens-135b1350_nike-executives-subjects-of-sex-discrimination-activity-7130636922284085250-s2sk/ (last visited March 30, 2024).

5. Attached hereto as **Exhibit C** is a true and correct copy of Oracle America Inc.’s (“Oracle”) Motion for Sanctions for Repeated and Intentional Violations of the Amended Protective Order and for Fees, filed February 29, 2016 in the Circuit Court of Oregon, Marion

County case captioned *Ellen Rosenblum, et al. v. Oracle America, et al.*, Case No. 14C20043.

6. Attached hereto as **Exhibit D** is a true and correct copy of Markowitz Herbold PC's Opposition to Oracle's Motion for Sanctions for Repeated and Intentional Violations of the Amended Protective Order and for Fees, filed March 7, 2016 in Circuit Court of Oregon, Marion County case captioned *Ellen Rosenblum, et al. v. Oracle America, et al.*, Case No. 14C20043.

7. Attached hereto as **Exhibit E** is a true and correct copy of an article by Matthew Kish' for the Portland Business Journal, entitled "*Meet the Portland lawyer taking on Nike's 'boys' club' culture,*" dated August 15, 2018, and publicly available at <https://www.bizjournals.com/portland/news/2018/08/15/meet-the-portland-lawyer-taking-on-nikes-boys-club.html> (last visited March 31, 2024).

8. Attached hereto as **Exhibit F** is a true and correct copy of an article by Nick Budnick for the Portland Tribune, entitled "*Documents Oracle Doesn't Want You To Read About Cover Oregon,*" dated February 23, 2016, and publicly available at <https://www.ijpr.org/politics-government/2016-02-23/documents-oracle-doesnt-want-you-to-read-about-cover-oregon> (last visited March 31, 2024).

9. Attached hereto as **Exhibit G** is a true and correct copy of an article by Jeff Manning for the Oregonian, entitled "*Unsealed Nike documents reveal widespread complaints of harassment, pay disparities,*" dated January 17, 2023, and publicly available at <https://www.oregonlive.com/business/2023/01/unsealed-nike-documents-reveal-widespread-complaints-of-harassment-pay-disparities.html> (last visited April 1, 2024).

10. Attached hereto as **Exhibit H** is a true and correct copy of an article by Jeff Manning for the Oregonian, entitled "*Class-action lawsuit on Nike: 'where women are devalued and demeaned',*" dated August 10, 2018, and publicly available at

https://www.oregonlive.com/business/2018/08/class-action_lawsuit_on_nike_w.html (last visited April 1, 2024).

11. Attached hereto as **Exhibit I** is a true and correct copy of an article by Matthew Kish for the Oregonian, entitled “*Deposition shakes up Nike pay discrimination lawsuit; Nike wants it barred,*” dated October 5, 2023, and publicly available at <https://www.oregonlive.com/business/2023/10/deposition-shakes-up-nike-pay-discrimination-lawsuit-nike-wants-it-barred.html> (last visited April 1, 2024).

12. Attached hereto as **Exhibit J** is a true and correct copy of an article by Matthew Kish for the Oregonian, entitled “*New account of toxic Nike culture comes from Mark Parker’s onetime sister-in-law, a former employee,*” dated April 14, 2024, and publically available at <https://www.oregonlive.com/business/2024/04/new-account-of-toxic-nike-culture-comes-from-mark-parkers-onetime-sister-in-law-a-former-employee.html> (last visited April 16, 2024).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 17th day of April, 2024, at Los Angeles, California.

/s/ Daniel Prince

DANIEL PRINCE